

# **EXHIBIT A**



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June 5, 2015

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**VIA E-MAIL (MALLAN@STEPTOE.COM)**

Michael Allan  
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1330 Connecticut Avenue, NW  
Washington, DC 20036-1795

Re: *BMG Rights Management (US) LLC, et al. v. Cox Enterprises, Inc., et al.*  
Case No. 1:14-cv-01611-LO-JFA, USDC, EDVA

Mike:

Enclosed is Cox's production in response to the Court's May 15, 2015 Order. We interpret the Court's Order to require Cox to provide personally identifiable information (PII) for those subscribers currently assigned to the 250 IP addresses referenced in the Order. Cox identified those subscribers as of the date of the Order. Of the 250 IP addresses identified in the Order, 1 is currently unassigned and not associated with any subscriber. One IP address was inadvertently missed. A notice will go out to this subscriber immediately, and if this subscriber does not object, then Cox will supplement and provide the information designated below for that subscriber. For the remaining 248, Cox notified each of the current subscribers of the Court's Order (see the form notice enclosed as Exhibit B). 32 subscribers contacted Cox to object, or indicate their intent to object, to the production of their PII. Pursuant to the Court's instructions, Cox is not producing PII for those subscribers. For the remaining 216 IP addresses, the PII for those subscribers is included in worksheet one of the enclosed spreadsheet (Exhibit A).

Cox also attempted to identify subscribers associated with the relevant IP addresses during the periods of alleged infringement identified in Exhibit 4 to Plaintiffs' motion to compel. Cox was able to identify that information for 139 of the relevant IP addresses. Cox notified those historical subscribers of the Court's Order (see the form notice enclosed as Exhibit C). 17 of those subscribers contacted Cox to object, or indicate their intent to object, to the production of their PII. Pursuant to the Court's instructions, Cox is not producing PII for those subscribers. For the remaining 122 IP addresses, the PII for those subscribers is included in worksheet two of the enclosed spreadsheet.

The Order also requires Cox to "provide a copy of any documents previously produced for these IP addresses without the name, address, account number, and bandwidth speed being redacted." Pursuant to the Court's Order, all responsive documents are enclosed in un-redacted form.

Michael Allan  
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If you have any questions, please feel free to contact me.

Respectfully,

FENWICK & WEST LLP

*/s/ Brian Buckley*

Brian D. Buckley

Enclosures